

# Exhibit 1

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**From:** Azman, Darren <Dazman@mwe.com>  
**Sent:** Wednesday, October 16, 2024 11:27 PM  
**To:** Shpeen, Adam L.  
**Cc:** JAlberto  
**Subject:** BL Discovery

Adam- Just want to give you a heads up that discovery requests are coming your way tomorrow afternoon. We will ask that the Debtors consent to 2004 by Friday, while reserving all rights to object to the discovery requests. Would rather not have to file a 2004 motion. I assume you guys will consent. We'll be asking for production to occur on a rolling basis and to be completed within a week. We don't really have additional time to waste given the accelerated challenge deadline. By and large, we are looking for all docs and communications related to the loans, all docs and communications related to the Debtors' retention of Gordon Brothers, and board minutes/board materials going back a certain period of time. Let's chat once it comes over if you think there are going to be issues either with the scope or timing. There will be a separate set of discovery requests sent later on for potential D&O and other claims unrelated to challenge period.

DARREN AZMAN  
Partner

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